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UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

APOTHECARY MOVEMENT, LLC, a Utah
limited liability company,

Plaintiff,

vs.

BH ELEGANT LINENS, LLC dbas AA
WHOLESALE DEALS and SWIFT
INNOVATIONS, a New York limited liability
company,

Defendants.

**MOTION TO EXTEND DEADLINE TO
RESPOND TO MOTION TO DISMISS
UNTIL AFTER A RULING ON
MOTION FOR JURISDICTIONAL
DISCOVERY [DOC 74]**

Case No.: 2:23cv00845-HCN-DAO
Judge Howard C. Nielson, Jr.

COMES NOW Plaintiff Apothecary Movement, LLC (“Apothecary”), and respectfully
submits this *Motion to Extend Deadline to Respond to Motion to Dismiss until after ruling on the
Motion for Jurisdictional Discovery [Doc 74]*.

Requested Relief

In light of the pending *Motion for Jurisdictional Discovery* [Doc 74], and pursuant to
Fed. R. Civ. P. 6 and DUCivR 7-1, Apothecary respectfully requests that this Court extend its
response deadline to the *Motion to Dismiss* until the later of 14 days of denial of the *Motion for*

Jurisdictional Discovery or 14 days after the completion of jurisdictional discovery.

Argument

On May 29, 2024, Defendants filed a *Motion to Dismiss for lack of Personal Jurisdiction* [Doc 70]. On June 24, 2024, Plaintiff filed a *Notice of Insufficiency of Evidence and Motion for Jurisdictional Discovery* [Doc 74].

Fed. R. Civ. P. 6 states, “When an act may or must be done within a specified time, the court may, for good cause, extend the time” Presently, the opposition deadline for the *Motion to Dismiss* is July 8, 2023. Because the deadline to respond has not yet passed, and due to the pending *Motion for Jurisdictional Discovery*, good cause exist to extend the deadlines for the *Motion to Dismiss*.

Therefore, Apothecary respectfully requests that this Court extend the deadline to the later of 14 days after a ruling on the *Motion for Jurisdictional Discovery*, in case of denial, or 14 days after the completion of limited jurisdictional discovery as permitted by the court in response to the *Motion for Jurisdictional Discovery*.

Conclusion

Based on the foregoing, the Court should grant this *Motion for Extension*, and extend the response deadline to the *Motion to Dismiss* until the later of 14 days of denial of the *Motion for Jurisdictional Discovery* or 14 days after the completion of jurisdictional discovery.

DATED this 1st day of July 2024.

CAMERON RINGWOOD, LC

/s/ Jordan K. Cameron

Jordan K. Cameron

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2024, I served the foregoing via ECF, which provided a copy to:

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